

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
(Baltimore Division)**

ANIKA GREENE, et al.,

\*

Plaintiffs,

\*

Case No. 1:10-cv-00115-WDQ

v.

\*

SOUTHERN AUTO FINANCE  
COMPANY, et al.

\*

\*

Defendants.

\*

\* \* \* \* \*

**DEFENDANT SOUTHERN AUTO FINANCE COMPANY'S MOTION TO  
DISMISS COUNTS IV AND V OF THE COMPLAINT**

Defendant Southern Auto Finance Company (“SAFCO”), by its undersigned counsel, pursuant to Rule 12(b)(6), submits this Motion to Dismiss Counts IV and V asserted, and the punitive damages sought, in the Complaint filed by Plaintiffs, Anika Greene and Richard Greene (“**Plaintiffs**”) on the grounds that Counts IV and V asserted, and the punitive damages sought, fail to state claims upon which relief can be granted. The grounds for this motion are stated in detail in the Memorandum in Support of the Motion to Dismiss filed contemporaneously with this motion and incorporated herein by reference.

Respectfully submitted,

/s/ Nathan D. Adler

---

Nathan Daniel Adler, Bar No. 22645  
Elliott Engel, Bar No. 28299  
Neuberger, Quinn, Gielen,  
Rubin & Gibber, P.A.  
One South Street, 27<sup>th</sup> Floor  
Baltimore, Maryland 21202-3201  
(410) 332-8516  
[nda@nqgrg.com](mailto:nda@nqgrg.com)

Attorneys for Defendant,  
Southern Auto Finance Company